

June 10, 2009

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

**Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for May 2009**

Dear Mssrs. Humphrey and Blischke:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN MAY 2009

No field activities were performed during May.

Deliverables Approved by EPA

- None.

Deliverables Submitted to EPA

- May 7, 2009: Revised Phase 2 Recalibration Results: Hydrodynamic Sedimentation Modeling for Lower Willamette River.
- May 18, 2009: Lower Willamette River Sidescan Sonar Data Report.

Comments/Documents provided by EPA

- May 6, 2009: EPA provided review comments on the February 18, 2009 Stormwater Loading Check-in Materials.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

None.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

The following chemical analysis results were validated in May 2009:

Round 3B Sediment Chemical Mobility - SBLT Elutriates

Lab	Analyte Group	Total # Samples for Task	Data Received	% Analysis Complete	% Validation Complete
			May 2009		
ARI	SBLT elutriate prep	44	0	100	NA
ARI	Conventionals	44	0	100	99
ARI	Metals	44	0	100	99
ARI	PAH-SIM	44	0	100	99
ARI	Pesticides	44	0	100	99
ARI	Phenols	44	0	100	99
ARI	Phthalates-SIM	44	0	100	99
ARI	SVOC	44	0	100	99
ARI	TPH	44	0	100	99
Vista	Dioxins	16	0	100	99
Vista	PCB congeners	44	0	100	99

4. SCHEDULE FOR THE NEXT FOUR MONTHS

Work described in the ASOC that is potentially planned for June, July, August, September 2009 includes the following:

- Early June 2009: Treatment Technologies Screening Table
- Mid June 2009: Disposal Site Screening Table.

Submittal dates for pending products currently under preparation by LWG and scheduled for submittal in upcoming months are listed in Table 1 - Status of Active LWG Deliverables - Portland Harbor RI/FS. This table has been reformatted from previously submitted versions to only include pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2 - Status of LWG Deliverables - Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports. Submittal dates for several products related to the RI/FS are not available, as EPA and LWG have not yet finalized the revised schedule for the RI/FS.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on several documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests document approvals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. The LWG believes that several documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are indeed not needed.

If you have any questions, please give me a call at (206) 287-9130.

Sincerely,



Keith Pine
LWG Technical Project Manager

Copies: Jim Anderson, ODEQ (email only)
Matt McClincy, ODEQ (email only)
Kristine Koch, EPA (email only)
Greg Gervais, NOAA (email only)
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Brian Cunningham, Confederated Tribes of Warm Springs (email only)
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Julie Weis, Confederated Tribes of Siletz (email only)
Audie Huber, Confederated Tribes of Umatilla (email only)
J D Williams, Confederated Tribes of Umatilla (email only)
Michael Karnosh, Grand Ronde (email only)
Lisa Bluelake, Grand Ronde (email only)
Erin Madden, Nez Perce Tribe (email only)
Sheila Fleming, Ridolfi (email only)
Jennifer Peers, Stratus Consulting (email only)
LWG Management
LWG Repository

Table 1. Status of Active LWG Deliverables - Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Round 3B (FS) Side-scan Sonar Data Report</i>	September 2008	<u>Submitted 5/18/2009</u>	
<i>Phase 2 Hydrodynamic Re-calibration Report</i>	May 2009	<u>Submitted 5/7/2009</u>	TBD
<i>Treatment Beneficial Use Market Survey</i>	Mid February 2009	Submitted 4/3/2009	5/1/2009
<i>Treatment Technologies Screening Table</i>	Early May 2009	<u>Planned submittal date is early June 2009</u>	
<i>Disposal Site Screening Table</i>	Mid May 2009	<u>Planned submittal date is mid June 2009</u>	

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX., Paragraph 4 of AOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of AOC.

Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables - Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Round 1			
<i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i>	November 2007	Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.	
Round 2 Biota			
<i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	11/23/2005	Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required	12/8/2005
<i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	TBD	On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required.	
Hydro/Sed Modeling			
<i>Phase 2 Recalibration Results: Hydrodynamic Sedimentation Modeling for the Lower Willamette River</i>	12/8/2006	Submitted 12/8/2006: EPA comments received 4/3/2007	
<i>Phase 2 Hydrodynamic Recalibration Report</i>	May 2009	<u>Submitted 5/7/2009</u>	
Groundwater Pathway			
<i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i>	4/22/2005	Submitted 4/22/2005; EPA comments received 6/3/2005	

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<i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i>	TBD	Outstanding issues to be addressed in TZW Appendix to Draft RI Report.	
<i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i>	TBD	Outstanding issues to be addressed in TZW Appendix to Draft RI Report.	
<i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	4/29/2005	Submitted 4/29/2005; EPA comments received 6/10/2005	
<i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i>	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i>	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	

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Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
<i>Revised Transition-Zone Water FSP Addendum 2</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Natural Attenuation			
<i>Step 2 Natural Attenuation Evaluation Report</i>	No longer needed	EPA's proposed fate and transport modeling approach will provide the needed evaluation on monitored natural recovery (MNR). We propose that model be used to identify any further MNR data gaps and evaluations once it is up and running.	
Tech Memos			
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	

Table 2. Status of LWG Deliverables - Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Second Revision Preliminary Risk Evaluation Approach TM	1/7/2005	Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.	
Comprehensive ERA Approach TM	6/27/2004	Submitted; EPA comments received 10/1/2004	
Revised Comprehensive ERA Approach TM	TBD	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
Process for Derivation of PRGs TM	1/20/2005	Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.	3/21/2005
<i>Draft Approach to Determining Background for the Portland Harbor Superfund Site</i>	3/3/2006	Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.	5/2/2006
<i>Revised Approach to Determining Background for the Portland Harbor Superfund Site</i>	7/20/2006	The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report	
<i>Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA</i>		The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report	

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Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>COPC Selection Interim Deliverable</i>	~1/23/2006	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
ECOLOGICAL RISK ASSESSMENT			
Ecological Preliminary Risk Evaluation (PRE)	9/9/2005	Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required	11/8/2005
<i>Round 2 Benthic Assessment Interpretation Report</i>	3/17/2006	Submitted 3/17/2006; EPA comments received 7/6/2006	5/16/2006
<i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site</i>	11/4/2005	Submitted 11/4/2005; EPA comments received 3/10/2006	1/3/2006
<i>Revised Ecological Water Screening Levels</i>	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08
<i>Round 3B (FS) Side-scan Sonar Data Report</i>	September 2008	<u>Submitted 5/18/2009</u>	
<i>Treatment Beneficial Use Market Survey</i>	Mid February 2009	Submitted 4/3/2009	5/1/2009

Table 2. Status of LWG Deliverables - Portland Harbor RI/FS

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<i>Treatment Technologies Screening Table</i>	Early May 2009	<u>Planned submittal date is early June 2009</u>	
<i>Disposal Site Screening Table</i>	Mid May 2009	<u>Planned submittal date is mid June 2009</u>	
<i>Early Preliminary Remediation Goals (PRGs)</i>	Late March 2009	Submitted 3/27/2009	
General Field/Data/RI Reporting			
<i>Validated Analytical Results</i>	90 days following completion of each sampling activity		
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
<u>Draft RI Report and Baseline Risk Assessment Reports</u>	<u>180 days from completion of Round 3 sampling.</u>		
STORMWATER			
<i>Stormwater Loading Check-in Materials</i>	February 2009	Submitted 2/18/2009; <u>EPA comments received 5/6/2009</u>	
SEDIMENT			
<i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i>		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	

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<i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i>		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i>		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i>	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Round 3B QAPP Addendum 10 for Sediment Sampling</i>	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	
FATE & TRANSPORT			
<i>Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report</i>	July 2007	Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.	
<i>F&T Surface Sediment FSP – Addendum to 3B Sediment FSP</i>	December 2007	Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed.	
CULTURAL RESOURCES			
<i>Draft Cultural Resource Survey Report</i>	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA comments not time-critical at this point in the project

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Only deliverables due within the next four months are shown.

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Deliverable submitted to EPA and its partners.

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